



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

June 8, 2020

BY ECF

The Honorable William H. Pauley, III
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl St. Room 1920
New York, New York 10007

Re: United States v. Paul M. Daugerdas, 09 Cr. 581 (WHP)

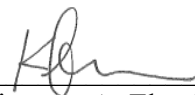
Dear Judge Pauley:

The Government respectfully submits this joint letter to update the Court on the status of discovery and to request an adjournment of the parties' deadlines for completing depositions in the above-referenced ancillary proceeding concerning Eleanor Daugerdas. Consistent with the Court's March 23, 2020 scheduling order, the parties exchanged discovery demands and interrogatories on April 30, 2020. However, as a result of the COVID-19 pandemic, the parties have been unable to produce the required responses and do not anticipate being able to do so for at least another 30 days and perhaps longer. Accordingly, the parties do not anticipate being able to take depositions before the July 31, 2020 deadline for completion of depositions, and respectfully request the Court adjourn that deadline for a period of 60 days to a date in late September 2020.

Respectfully submitted,

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By:



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cc: Counsel (by ECF)